

REMARKS

In the Final Office Action dated August 22, 2001, the Examiner rejected claims 1-14 under 35 U.S.C. §102(a) as being anticipated by Lau (U.S. Patent No. 5,987,247). This rejection is respectfully traversed for the following reasons.

To anticipate a patent claim, a **single** prior source must contain all its essential elements. Rockwell International Corp. v. United States, 147 F.3d 1358, 1363, 47 USPQ2d 1027,1031 (Fed. Cir. 1998) ("Anticipation under 35 U.S.C. Section 102 requires the disclosure in a **single piece of prior art** of each and every limitation of a claimed invention. . . . Whether such art is anticipating is a question of fact."); Gechter v. Davidson, 116 F.3d 1454, 1457, 43 USPQ2d 1030, 1032 (Fed. Cir. 1997) ("Under 35 U.S.C. § 102, every limitation of a claim must identically appear in a **single prior art reference** for it to anticipate the claim."). The Examiner cites additional pieces of prior art in support of a 102(a) rejection: Principles of Object Oriented Analysis and Design (hereinbelow Martin); Client/Server Programming with Java and Corba (hereinbelow Orfali) and The San Francisco Project: An Object-Oriented Framework Approach to Building Business Applications (hereinbelow The San Francisco Project). The multiple references are used to show elements of the claimed invention that do not exist in Lau. They are not cited to: (1) prove that primary reference contains an enabled disclosure; or (2) to explain the meaning of a term used in Lau; or (3) to show that a characteristic not disclosed in the Lau reference is inherent. The use of the additional references cited is improper for a 102 rejection. However, even with reliance on these additional references the instant claims are not anticipated.

LAW OFFICES

FINNEGAN, HENDERSON,
FARABOW, GARRETT,
& DUNNER, L.L.P.
1300 I STREET, N. W.
WASHINGTON, DC 20005
202-408-4000

Lau (U.S. Patent No. 5,987,247) discloses systems, methods and computer program products for building frameworks in an object oriented environment. Lau is cited to identify a system core class group and the general definition of a framework. The disclosure of the definition of a general framework and the function of the system core class group within Lau fails to teach a method for constructing a business application system by using a framework according to the method of claim 1. Simply disclosing that a system core class exists, does not reveal how the core class relating to a business logic system is incorporated into the framework as claimed. This relationship is not disclosed in Lau, Martin, or Orfali.

The Examiner also states in the Office Action that "(p)rior art also teaches reports, using a DDL (Data Definition Language) which is an industry standard language used in AD HOC reporting." Lau merely discloses that the reports relating to information of a framework can be produced from the tool. Lau does not disclose that the framework includes a core class relating to a report system class group. There is also no discussion of how a core class relating to a report system is incorporated into the framework. The claimed invention includes, for example, a framework within a system core class group, which has abstractly defined a basic structure and behavior of a business application system, and an abstract class group, which inherits the system core class group and which includes a screen system class group, a report system class group and a business logic system class group. Lau fails to describe or teach the steps claimed in claim 1.

The Examiner cites Martin and identifies text that includes descriptions and titles of "Report Generators" and "Screen and Dialog Painters." However, this text only

LAW OFFICES

FINNEGAN, HENDERSON,
FARABOW, GARRETT,
& DUNNER, L.L.P.
1300 I STREET, N. W.
WASHINGTON, DC 20005
202-408-4000

discloses that a report system and a screen system can be designed by using a tool. To be anticipating, a prior art reference must disclose each and every limitation of the claimed invention[.]...must be enabling[,] and [must] describe...[the] claimed invention sufficiently to have placed it in possession of a person of ordinary skill in the field of invention." Helifix Ltd. v Blok-Lok, Ltd., 208 F.3d 1339, 54 USPQ2d 1299 (Fed. Cir. 2000) (citing In re Paulsen, 30 F.3d 1475, 1478-79, 31 USPQ2d 1671, 1673 (Fed. Cir. 1994)). Lau only discloses basic concepts and terms concerning object oriented technology and business frameworks. Therefore, since none of the prior art presented by the Examiner discloses all the limitations of claim 1, the Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claim 1 under §102(a) as anticipated by Lau.

Claim 2 is dependent on claim 1 and is allowable based on its dependency from an allowable claim. Furthermore, claim 2 includes the recitation "a common component group including a plurality of common components commonly for use in the said business application system, each of said components having an interface with said abstract class group." Lau fails to disclose at least components having an interface to the abstract class group as claimed in claim 2. Lau discusses a general framework but fails to disclose at least the configuration of components contained in the framework claimed. Therefore, since Lau fails to teach all the recitations of claim 2, the Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claim 2 under §102(a) as anticipated by Lau.

LAW OFFICES

FINNEGAN, HENDERSON,
FARABOW, GARRETT,
& DUNNER, L.L.P.
1300 I STREET, N. W.
WASHINGTON, DC 20005
202-408-4000

Claims 3 and 4 are allowable at least by virtue of their dependency on allowable claim 1. These claims, furthermore, are not anticipated by Lau based at least upon the arguments, above, related to claim 1. The Examiner incorrectly characterizes the core classes of the screen system class, report system class and business logic system class as concrete classes. There does not exist, in Lau, at least a system core class group, a screen system class, a report system class and a business logic system class which inherits class functionality as claimed. Therefore, since Lau fails to disclose all the limitations of claims 3 and 4, Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claims 3 and 4 under §102(a).

Claim 7 is not anticipated by Lau, Martin, or Orfali, based at least upon the above arguments related to claim 1. In particular Lau, Martin, and Orfali fail to disclose, at least the creation of an abstract class group including a system core class group, which has abstractly defined a basic structure and behavior of said business application system, and a screen system class group, a report system class group and a business logic system class group, which inherit said system core class group. Therefore, since Lau, Martin, and Orfali fail to disclose all the recitations of claim 7, Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claim 7 under §102(a).

Claims 5, 6, 8, 9, and 10 depend from independent claims 1 or 7 and include all the limitations of their respective allowable independent claims. At least by virtue of their dependence, Applicants respectfully request the withdrawal of the rejection of claims 5, 6, 8, 9 and 10.

LAW OFFICES

FINNEGAN, HENDERSON,
FARABOW, GARRETT,
& DUNNER, L.L.P.
1300 I STREET, N.W.
WASHINGTON, DC 20005
202-408-4000

Claims 11 and 13 are not anticipated Lau, Martin, Orfali or The San Francisco Project based at least upon the above arguments related to claim 1. In particular, the components and inherency recited in these claims are not disclosed in the Lau, Martin, Orfali or The San Francisco Project references. There does not exist, in Lau, Martin, Orfali or The San Francisco Project at least a system core class group, a screen system class, a report system class and a business logic system class which inherit a system core class group as claimed. Therefore, since Lau, Martin, Orfali and The San Francisco Project fail to disclose all the recitations of claims 11 and 13, Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claims 11 and 13 under §102(a).

Claims 12 and 14 depend from independent claims 11 or 13 and include all the limitations of their respective allowable independent claims. At least by virtue of their dependence, Applicants respectfully request the withdrawal of the rejection of claims 12 and 14.

In view of the foregoing remarks, Applicants respectfully request the reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

Dated: December 21, 2001

By: 

George D. Medlock, Jr.
Reg. No. 48,167

LAW OFFICES

FINNEGAN, HENDERSON,
FARABOW, GARRETT,
& DUNNER, L.L.P.
1300 I STREET, N. W.
WASHINGTON, DC 20005
202-408-4000

APPENDIX

11. A computer-readable storage medium having stored a framework for a business application system, which includes a plurality of class groups which are described by an object-oriented language and which are capable of manipulating data uniformly produced from each of said class groups, said framework including:

a system core class group having defined the manipulation of data;

and

a screen system class, a report system class and a business logic system class

[plurality of subclasses] inheriting said system core class group.

13. A computer-readable storage medium having stored a framework for a business application system, which includes a plurality of class groups which are described by an object-oriented language and which are capable of transmitting and receiving a request between functions produced from each of said class groups, said framework including:

a system core class group having defined the transmission and receiving of a request between functions;

and

a screen system class, a report system class and a business logic system class

[plurality of subclasses] inheriting said system core class group.

LAW OFFICES

FINNEGAN, HENDERSON,
FARABOW, GARRETT,
& DUNNER, L.L.P.
1300 I STREET, N. W.
WASHINGTON, DC 20005
202-408-4000